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June 3, 2008

Ms. Jaclynne Drummond  
Compliance Hydrogeologist  
North Carolina Department of Environment and  
Natural Resources – Division of Waste Management  
Solid Waste Section  
401 Oberlin Road, Suite 150  
Raleigh, North Carolina 27699-1646



Subject: Wake County, North Carolina  
North Wake Unlined Landfill  
Proposed Modifications to Groundwater Monitoring Plan  
MW-27 and MW-9

Dear Ms. Drummond:

This letter is a follow up to our meeting with Mr. Johnny Beal of Wake County Solid Waste Management (WCSWM) on May 16, 2008, at which time we discussed proposed modifications to the groundwater monitoring plan for the North Wake Unlined Landfill. The purpose of this letter is to formally propose the modifications we discussed and to request that the Solid Waste Section approve the proposed modifications so that CDM and WCSWM can move forward with the modifications.

The following modifications were discussed and will be presented in a scope of work to WCSWM to first schedule and then implement the following modifications.

- MW-27 located to the north of Abbot's Creek has been damaged. CDM was to determine whether MW-27 can still be sampled and either make repairs to the protective casing or abandon if MW-27 can no longer be sampled.  
Action Item: It has been determined that MW-27 can no longer be sampled and will be abandoned in accordance with Subchapter 2C, Section .0113.
- Volatile Organic Compounds (VOC's) have been detected during previous sampling events in MW-9. This may be due to the close proximity of MW-9 to the limits of waste. Given the limited buffer area on the north side of the landfill, there is the concern that VOC's may be migrating beyond the landfill property boundary.  
Action Item: Select a location for a nested pair of shallow/deep groundwater monitoring wells beyond the landfill property boundary and south of Abbot's Creek to monitor for the migration of VOC's. The new monitoring wells will be located closer to MW-9, but also triangulated with MW-6/6D and also serve as the replacement for MW-27. The County is to verify the location of a proposed new greenway and obtain a



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temporary easement to access the new monitoring wells before selecting a location and installing the wells.

- Surface water sampling of Abbot's Creek has been proposed in order to monitor for the possible discharge of VOC's to Abbot's Creek.

Action Item: Surface water samples both upgradient and downgradient of the approximated discharge point from MW-9 to Abbot's Creek will be added to the monitoring plan and continue as surface water sampling points during future semi-annual sampling events. The downgradient surface water sampling point will be located just before Abbot's Creek enters the Mallinckrodt property.

Initial sampling will be included for both the new groundwater monitoring wells and the surface water sampling locations under this modification to the groundwater monitoring plan and be included in all future semi-annual sampling events.

Initial sampling parameters for the new monitoring wells will include North Carolina Solid Waste Section Appendix I VOC and Metals parameters in addition to detected Appendix II Parameters in MW-9 (bis-1, 2-ethylhexyl Phthalate, mercury, Dinoseb, Beta-BHC, and Gamma-BHC). Existing well MW-9 will continue to be sampled during the semi-annual events. The surface water samples will be analyzed for the Appendix I VOC and Metals plus mercury.

These additional sample locations will be surveyed and presented on an updated ground water monitoring plan and presented in a report to the SWS, along with boring logs, monitoring well installation diagrams and initial analytical data.

Implementation of this modification to the groundwater monitoring plan will be scheduled upon receipt of your approval. Please contact me at (919) 787-5620 should you have any questions.

Very truly yours,

A handwritten signature in black ink that reads 'Robert E. Brossoie'.

Robert E. Brossoie, P.G., C.P.G.  
Senior Project Manager  
Camp Dresser & McKee

cc: Johnny Beal, WCSWM  
Mat Colone, CDM